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Attorneys for Plaintiff  
CURTIS McCAMY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CURTIS McCAMY,	)	CASE NO. C-15-00250 MEJ
	)	
Plaintiff,	)	
	)	<b>REQUEST FOR CONTINUANCE OF</b>
vs.	)	<b>INITIAL CASE MANAGEMENT</b>
	)	<b>CONFERENCE AND <del>PROPOSED</del></b>
MATSON NAVIGATION COMPANY	)	<b><u>ORDER THEREON</u></b>
and DOES 1-5, <i>in personam</i> , and S/S	)	
LURLINE, her engines, tackle, apparel,	)	
furniture, and appurtenances, <i>in rem</i> ;	)	
	)	
	)	
Defendants.	)	

Plaintiff CURTIS McCAMY (“Plaintiff”) hereby submits his Request for  
Continuance of Initial Case Management Conference and Proposed Order Thereon as  
follows:

**RECITALS AND MOTION**

WHEREAS Plaintiff is a merchant seaman and has, since his accident aboard the  
vessel operated by Defendant Matson Navigation Company (“Matson”), returned to work,  
including aboard vessels operated by Matson; and

WHEREAS Plaintiff and Matson were in the process of discussing settlement prior  
to the filing of the present action, but were not able to resolve Plaintiff’s claim prior to the

1 running of the statute of limitation, thus necessitating the filing of the present action; and

2 WHEREAS Counsel for Plaintiff and in-house claims representatives for Matson  
3 are continuing settlement discussions and it is hoped that the matter will be resolved  
4 without the need to serve the complaint (which will require Matson to retain counsel); and

5 WHEREAS Plaintiff believes that the case has a very good chance of being  
6 resolved within the next thirty (30) days; and

7 WHEREAS Plaintiff will serve the summons and complaint (and related orders) if  
8 the claim is not resolved within twenty-one (21) days; and

9 WHEREAS the current deadline for the filing of a Joint Case Management  
10 Statement (and Rule 26(f) Report) is April 16, 2015; and

11 WHEREAS the Initial Case Management Conference is currently set on April 23,  
12 2015:

13  
14 **WHEREFORE** Plaintiff respectfully requests that the filing of the Joint Case  
15 Management Statement (and Rule 26(f) Report) and the Initial Case Management  
16 Conference, be continued for forty-five (45) days.

17 DATED: April 15, 2015

Respectfully submitted,

18  
19 BRODSKY MICKLOW BULL & WEISS LLP

20  
21 By: /S/ Edward M. Bull III  
Edward M. Bull III

22 Attorneys for Plaintiff  
23 CURTIS McCAMY  
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~~PROPOSED~~ ORDER

Having reviewed the Request for Continuance of Initial Case Management Conference and Proposed Order Thereon, and finding that good cause exists to grant the relief requested, IT IS HEREBY ORDERED THAT:

The current Initial Case Management Conference date is hereby VACATED and reset for June 25, 2015.

A Joint Case Management Statement (and Rule 26(f) Report) are to be filed no later than June 18, 2015.

DATED: April 16, 2015

By: 

Hon. Maria-Elena James  
Magistrate Judge